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[See signature block for additional counsel]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DAVID ESCOBAR, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

BEENVERIFIED, INC., and
BEENVERIFIED, LLC,

Defendants.

Case No. 3:21-cv-09433-MMC

**STIPULATION TO (1) EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT,
AND (2) RESCHEDULE CASE
MANAGEMENT CONFERENCE;
DECLARATION OF DAVID W. SKAAR
[L.R. 6-1(b) and 6-2]**

Honorable Maxine M. Chesney

Pursuant to Local Rules 6-1(b) and 6-2, Plaintiff David Escobar and Defendants BeenVerified, Inc. and BeenVerified, LLC (“Defendants”) (together, the “Parties”) hereby stipulate as follows:

WHEREAS, by stipulation dated January 26, 2022, pursuant to Local Rule 6-1(a), the Parties filed a Stipulation to Extend Time to Respond to the Initial Complaint, from January 27, 2022 to February 28, 2022;

WHEREAS, the Case Management Conference Order, at docket number 12, set an initial Case Management Conference for March 11, 2022, at 10:30 a.m.;

WHEREAS, the Defendants have been investigating the Plaintiff’s substantive allegations, and counsel for the Parties have been conferring regarding the merits of the Complaint;

WHEREAS, counsel for the Parties have been discussing a potential early resolution of the Plaintiff’s claims; and

WHEREAS, the Parties agree that additional time is needed to allow the Parties to fully explore a potential early resolution, before the Parties incur fees and expenses related to one or more motions to dismiss or amended pleadings.

NOW, THEREFORE, it is hereby stipulated and agreed by and between the Parties, subject to the Court’s approval, that the current schedule be modified as follows:

1. That the deadline for Defendants to respond to the initial Complaint will be extended from February 28, 2022 to March 28, 2022; and

2. That the Case Management Conference will be continued from March 11, 2022 to April 15, 2022, at 10:30 a.m., and all related deadlines will be continued accordingly.

IT IS SO STIPULATED.

Dated: February 25, 2022

TURKE & STRAUSS LLP

By: /s/ Raina Borrelli

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Attorneys for Plaintiff David Escobar and
the Proposed Class

Dated: February 25, 2022

HOGAN LOVELLS US LLP

By: /s/ David W. Skaar

David W. Skaar
Attorneys for Defendants
BEENVERIFIED, INC. and
BEENVERIFIED, LLC

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Attestation

Pursuant to Local rule 5-1(h)(3), I attest that each of the other signatories listed above has
concurred in the filing of this document.

/S/ David W. Skaar

David W. Skaar

DECLARATION

I, David W. Skaar, declare as follows:

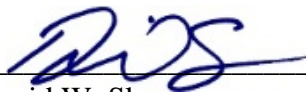
1. I am a member in good standing of the State Bar of California, a counsel in the law firm Hogan Lovells US LLP, and one of the attorneys representing Defendants BeenVerified, Inc. and BeenVerified, LLC in this action. I have personal knowledge of the fact stated in this declaration and would, if called as a witness, competently testify to those facts.

2. By stipulation dated January 26, 2022, pursuant to Local Rule 6-1(a), the Parties filed a Stipulation to Extend Time to Respond to the Initial Complaint, from January 27, 2022 to February 28, 2022. This was the Parties' first request for an extension of time in this matter.

3. The Defendants have been investigating the Plaintiff's substantive allegations, and counsel for the Parties have been conferring regarding the merits of the Complaint. Counsel for the Parties also have been discussing a potential early resolution of the Plaintiff's claims, and we have agreed that additional time is needed to allow the Parties to fully explore a potential early resolution, before the Parties incur fees and expenses related to one or more motions to dismiss or amended pleadings.

4. The requested extension of time to respond to the Complaint does not directly impact any other deadlines previously set by the Court. However, the Parties agree that it will be more efficient and productive for the Case Management Conference to occur after the Defendants file their response to the Complaint.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 25, 2022, in Mammoth Lakes, California.


David W. Skaar

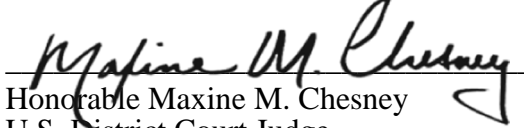
ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED THAT:

1. The deadline for Defendants to respond to the initial Complaint will be extended from February 28, 2022 to March 28, 2022; and

2. The Case Management Conference will be continued from March 11, 2022 to April 15, 2022, at 10:30 a.m., and all related deadlines will be continued accordingly.

Dated: February 28, 2022


Honorable Maxine M. Chesney
U.S. District Court Judge